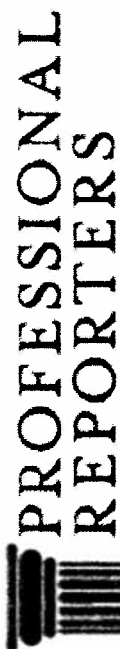


EXHIBIT A



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THE UNITED STATE DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

1. STATE OF OKLAHOMA, ex rel.
W.A. DREW EDMONDSON, in his capacity
as Attorney General of the State of
Oklahoma and OKLAHOMA SECRETARY OF
THE ENVIRONMENT C. MILES TOLBERT,
in his capacity as the Trustee for
Natural Resources for the State of
Oklahoma
Plaintiffs

vs.

05-CV-0329 GKF-SAJ

1. TYSON FOODS, INC.,
2. TYSON POULTRY, INC.,
3. TYSON CHICKEN, INC.,
4. COBB-VANTRESS, INC.,
5. AVIAGEN, INC.,
6. CAL-MAINE FOODS, INC.,
7. CAL-MAINE FARMS, INC.,
8. CARGILL, INC.,
9. CARGILL TURKEY PRODUCTION, LLC.,
10. GEORGE'S INC.,
11. GEORGE'S FARMS, INC.,
12. PETERSON FARMS, INC.,
13. SIMMONS FOODS, INC., and
14. WILLOW BROOK FOODS, INC.
Defendants.

DEPOSITION OF J. D. STRONG
TAKEN ON BEHALF OF THE DEFENDANTS
ON MARCH 15, 2007, BEGINNING AT 9:14 A.M.
IN OKLAHOMA CITY, OKLAHOMA

APPEARANCES

On behalf of the PLAINTIFFS

J. Trevor Hammons, Assistant Attorney General
OFFICE OF THE ATTORNEY GENERAL
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PR# 9833 STRONG J.D. 03/15/2007

1 that index? And feel free to take a look.

2 A. I don't have any reason to disagree, no.

3 Q. Okay. And then additionally, when we
4 look at, let's take for example box number 1, can you
5 tell me the approximate size of that box, is it like
6 a banker's box?

7 A. A standard file box.

8 Q. Do you know if box 1 is full?

9 A. I do not recall.

10 Q. Okay. Let's look at entry number 6, for
11 example, of box number 1, and on the index it says
12 under the column file/document name, it says fiscal
13 year, or FY 99 correspondence; correct?

14 A. Correct.

15 Q. Did you review that file?

16 A. I don't recall.

17 Q. Okay. So you couldn't tell me the size
18 of it?

19 A. No, I could not.

20 Q. And you couldn't tell me what's in it?

21 A. Only generally that it is most likely
22 grant related correspondence.

23 Q. For, I guess, a particular period of
24 time?

25 A. Fiscal year '99.



PR# 9833 STRONG J.D. 03/15/2007

1 Q. Okay. Would it relate to all grants in
2 '99?

3 A. I'm not sure.

4 Q. Is that possible?

5 A. Yes, it is possible.

6 Q. I mean, do you guys normally file
7 correspondence relating to grant just by year?

8 A. That has been done, yes.

9 Q. Okay. So there's a possibility there's
10 things in that folder that may not relate to the
11 Illinois watershed; right?

12 A. There's a possibility.

13 Q. Okay. And in the far right column it
14 says there it refers to Tyson, refers to Tyson Foods
15 number 8; correct?

16 A. Correct.

17 Q. Okay. Is there any reason why you could
18 not have Bates numbered the documents upstairs?

19 A. Didn't know it was necessary.

20 Q. I'm going to hand you what I'm going to
21 mark as Exhibit 15. And it is entitled Opinion and
22 Order. Take a look at that and take as much time as
23 you need and tell me whether or not you've ever seen
24 that before.

25 A. I do not recall seeing this.



PR# 9833 STRONG J.D. 03/15/2007

1 Q. Can you tell me the date of it?

2 A. February 26, 2007.

3 Q. And what was the approximate date you
4 started your search for documents here?

5 A. Approximately a month ago.

6 Q. Okay. If you could, could you turn your
7 attention to paragraph 8, I mean page 8 of that
8 order. Could you read the first full paragraph, just
9 basically in the middle?

10 MS. GENTRY: Mike, I'm going to object. We'll
11 stipulate that the order is the order. I mean, you
12 don't have to have him read it into the record. We
13 know what it says.

14 MR. BOND: I'd like him to read it.

15 THE WITNESS: "The Court does not by this order
16 intend to require a certain form of response that is
17 not helpful to the parties. The parties may meet and
18 confer and determine an appropriate manner of
19 responding that will be both helpful to defendants
20 and reasonable for plaintiff. The Court does conclude
21 that the current method is insufficient and suggests
22 a response that includes Bates numbers to avoid
23 situations where the parties' boxes of documents do
24 not correspond. Absent agreement by the parties to a
25 preferred method, the Court will require plaintiff to



PR# 9833 STRONG J.D. 03/15/2007

1 respond by listing responsive documents by document
2 box and Bates numbers for each interrogatory".

3 Q. (BY MR. BOND) Has the office of the
4 Secretary of Environment listed responsive documents
5 by document box and Bates number for each of my
6 clients' interrogatories?

7 MS. GENTRY: Object as asked and answered.

8 Q. (BY MR. BOND) Please answer it.

9 A. Not to my knowledge.

10 Q. Could you have done that?

11 A. I suppose we could.

12 Q. Why didn't you?

13 A. I did not know it was necessary.

14 Q. You were not told to do that?

15 A. Correct.

16 MR. BOND: Okay. I think I'm about done but I
17 would like to make a statement for the record; okay?

18 MR. HAMMONS: Sure.

19 MR. BOND: And my statement is that as the
20 witness has read from that order it's very clear that
21 the Court has ordered that documents that are
22 responsive to interrogatories be Bates numbered and
23 identified by box. Exhibit 10 shows me that that has
24 not been done and the witness has confirmed to me
25 that they have not been Bates numbered.

